

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT WINCHESTER**

UNITED STATES OF AMERICA,)	
<i>Plaintiff,</i>)	
)	
vs.)	No. 4:22-cr-00041-TRM-SKL-1
)	
TONY CANNON, JR.,)	
<i>Defendant.</i>)	

UNOPPOSED MOTION TO CONTINUE

COMES NOW Defendant and respectfully shows the Court as follows:

1. The Undersigned was formally appointed as replacement counsel this morning. [RE 38].
2. Before Judge Lee allowed prior counsel to withdraw, the Defendant consented to delay occasioned by entry of replacement counsel. [RE 38, PageID# 87].
3. Undersigned counsel has conferred with prior counsel. It is the undersigned's understanding that the discovery is voluminous, such that undersigned counsel has had to obtain an external hard drive so that prior counsel can copy the file, which is too large to electronically transmit.
4. The Defendant is being housed in Kentucky.
5. After conferring with prior counsel and with Mr. Winne about an appropriate continuance length, the Defendant would respectfully request, pursuant to 18 U.S.C.

§ 3161(h)(7), that the trial and pretrial deadlines be extended as follows, to enable effective preparation of defense counsel and to avoid a miscarriage of justice:

Item	Current Date	Requested New Date
• Plea-bargain execution	August 7, 2023	November 13, 2023
• Motions deadline	August 7, 2023	November 13, 2023
• Jury instruction requests	August 21, 2023	November 27, 2023
• Pretrial conference	August 21, 2023	November 27, 2023
• Jury selection	August 28, 2023	December 4, 2023

6. The Government advises that it does NOT object to the requested continuance.

Dated: August 3, 2023

Respectfully submitted,

TONY CANNON, JR.

s/Howard W. Anderson III
Howard W. Anderson III
B.P.R. No. 34693

TRULUCK THOMASON LLC
3 Boyce Ave.
Greenville, SC 29601
864-331-1751 (Ph)
1-888-501-1704 (toll free)

howard@truluckthomason.com

or

PO Box 2242
Cleveland, TN 37320-2242

CERTIFICATE OF SERVICE

I, Howard W. Anderson III, certify that I filed a copy of the foregoing paper using the Court's CM/ECF system, which will deliver a copy to all counsel of record except for the following, whom I have this day served by U.S. Mail:

n/a

s/Howard W. Anderson III
Howard W. Anderson III